## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CRAIG GOULET	)	
Plaintiff,	)	
v.	)	
NEW PENN MOTOR EXPRESS	)	
Defendant	)	
and	)	
TEAMSTERS LOCAL 25 INTERNATIONAL BROTHERHOOD OF	)	
TEAMSTERS	)	CIVIL ACTION
Defendant,	)	NO. 04-12577-JLT

## MOTION FOR LEAVE TO FILE REPLY IN RESPONSE TO PLAINTIFF'S OPPOSITION TO LOCAL 25'S MOTION FOR SUMMARY JUDGMENT

Defendant Teamsters Local 25, hereby moves this Honorable Court for leave to file the attached reply brief in support of its Motion for Summary Judgment.

As reasons therefore, Teamsters Local 25 states as follows:

- The Reply is necessary in order to address various misstatements of the record contained within the Plaintiff's Opposition to Local 25's Motion for Summary Judgment.
- 2. The Reply is necessary to address findings from the Plaintiff's Social Security file that was not produced to Local 25 until on or about February 13, 2006, after Local 25 had already filed its Motion for Summary Judgment.

For the Defendant,

INTERNATIONAL BROTHERHOOD OF **TEAMSTERS, LOCAL UNION NO. 25,** 

By its attorneys,

Kathleen a Pennani Matthew E. Dwyer (B.B.O. # 139840)

Kathleen A. Pennini (b.B.O. # 654573)

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Date: February 24, 2006

## **CERTIFICATE OF SERVICE**

I, Kathleen A. Pennini, do hereby certify I have electronically filed this motion on February 24, 2006, with delivery to:

Scott Lathrop, Esq. Scott A. Lathrop & Associates 122 Old Ayer Road Groton, MA 01450

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